*BELL*SOUTH

BellSouth Corporation
Suite 900
1133-21st Street, N.W.
Washington, DC 20036-3351

kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463 4113
Fax 202 463 4198

September 10, 2002

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
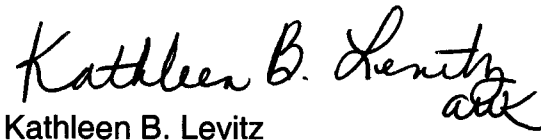445 12th Street, S.W.
Washington, D.C. 20554

<u>Re: WC Docket No. 02-150</u>

Dear Ms Dortch:

This is to inform you that on September 9,2002, Ernest Bush, Jonathan Banks, Glenn Reynolds, Robert Blau and I met with Matt Brill, legal advisor to Commissioner Abernathy, to discuss issues related to BellSouth's change management performance. The attached documents formed the basis for our presentation.

In accordance with Section 1.1206, I am filing two copies of this and request that you place it in the record of the proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz

Attachments

cc: Matt Brill
      Susan Pié
      James Davis-Smith

BellSouth's Change Control Process

- BellSouth has continued to strengthen its CCP since the approval of the Georgia/Louisiana Application. Improvements have been made in:
  - Implementation of high priority CLEC features.
  - Prioritization and resource allocation.
  - Discovering, minimizing and correcting software defects.
  - Change Control Process itself.
- BellSouth commits significant resources to CCP.
  - 2002: 300,000 programmer hours and $108M.
  - 2003: Comparable to 2002.
  - Contractors: Telcordia and Accenture

BellSouth's Change Control Process

- Implementation of high priority CLEC features.
  - Fully parsed CSR
  - Single C ordering
  - Mechanized ordering for line splitting, UDC, EELs
  - Process improvements such ability to create new listings in LENS, view multiple CSRs simultaneously, get connecting facility assignment information via pre-order query, etc.
- On track to implement "top 15" requests by year end.
  - Mechanized ordering for partial migrations of UNE loops.
  - Support for UNE to UNE bulk migration.
  - Electronic reject for invalid record change orders.
  - Etc.
- In addition to "top 15", BellSouth will implement 25 other change requests in 2002.

BellSouth's Change Control Process

- ## Prioritization and resource allocation
  - BellSouth is implementing OSS changes as quickly as possible given change control process and software engineering constraints.
    - CCP mandates lead times for each step in software development process; e.g. provision of user requirements, development of system requirements, coding and testing.
      - Effect is to limit number of releases in a given year.
    - Practical limitation on number of releases that can be in development simultaneously.
  - Claims of a substantial "backlog" of change requests are inflated. Features are being staged as required by the CCP.
  - BellSouth has now implemented the "50/50 allocation and prioritization process" as ordered by the Florida PSC.

BellSouth's Change Control Process

- ## Software Defects
  - Much attention has been focused on software defects in BellSouth's Release 10.5. Indeed, BellSouth was disappointed in having to report 35 CLEC affecting defects. But...
    - 30 of the 35 defects each affected between 1 and 10 CLEC orders.
      - Most were generated on orders that were in process as conversion to Release 10.5 was made. Unique and limited circumstance.
      - Remaining 5 defects were corrected within days of implementation.
    - By objective measure (defects per function point) BellSouth's software quality is very good and improving.
      - » Release 10.3: .00708 defects/function point
      - » Release 10.5: .00467 defects/function point
    - QP Management Group evaluation: .07000 is "best in class".
  - BellSouth is taking additional steps to improve release quality.
    - Reported 7 CLEC affecting defects associated with Release 10.6.
    - Release 10.6: .00055 defects/function point
  - Defect correction takes minimal CCP resource.

BellSouth's Change Control Process

- ## Process Improvement
  - Implementation of "50/50" plan pursuant to order of the Florida PSC.
  - Region-wide, voluntary implementation of CCP measures and penalties adopted by the Florida PSC
    - Time to fix software defects.
    - Percent of Change Requests accepted or rejected within 10 days.
    - Percent of Change Requests rejected.
    - Number of software defects in production releases.
    - Software validation.
    - Percent of Change Requests implemented within 60 weeks.
  - Adherence to process requirements.

Cumulative Summary of Change Requests
(Through 9/4/02)

CCP Classification		Type 2	Type 4	Type 5
Pending Clarification		**0**	**0**	**2**
New Requests		**0**	**0**	**20**
BLS response in process				5
BLS response late				0
Rejected-waiting on CLEC cancellation				8
Rejected-in negotiation				6
Other				1
Pending		**5**	**0**	**2**
Prioritized Candidate Requests		**10**	**8**	**18**
Scheduled		**8**	**1**	**5**
Release 11.0	4			3
Release 12.0	4			2
Manual/CCP Process			1	
Implemented		**24**	**46**	**43**

Cumulative Summary of Defects
(Through 9/4/02)

CCP Classification	Type 6 (Software)		Type 6 (Documentation	
Pending Clarification		5		1
New Requests		7		2
BLS response in process	0		0	
BLS response late	0		0	
Not validated-waiting CLEC cancellation	7		2	
Validated Defects		30		0
Scheduled		10		5
Implemented	425			